

**From:** "Tonja Haddad Coleman" <[REDACTED]>  
**To:** "Jeffrey Epstein" <jeevacation@gmail.com>  
**Subject:** RE: Outline of Hearing Argument  
**Date:** Wed, 01 Aug 2012 17:45:58 +0000

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I will absolutely bring it up indirectly- that Edwards has been pounding his chest threatening me to drop the case and that ethically I cannot advise you about doing so without a review of these documents.

[Tonja Haddad Coleman, Esq.](#)

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**From:** Jeffrey Epstein [mailto:jeevacation@gmail.com]  
**Sent:** Wednesday, August 01, 2012 1:39 PM  
**To:** [REDACTED]  
**Subject:** Re: Outline of Hearing Argument

i thought that you could make thepoint , but no need to do it directly

On Wed, Aug 1, 2012 at 12:50 PM, Tonja Haddad Coleman <[REDACTED]> wrote:  
I agree but this is a discovery hearing, so not really the time.

[Tonja Haddad Coleman, Esq.](#)

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**From:** Jeffrey Epstein [mailto:jeevacation@gmail.com]  
**Sent:** Wednesday, August 01, 2012 12:19 PM

EFTA00712223

**To:** [REDACTED]  
**Cc:** Jack Goldberger; Darren Indyke  
**Subject:** Re: Outline of Hearing Argument

I think that we should allow the judge to see that he can avoid lots of unnecessary work by getting rid of both cases.. since he loves scarola , maybe we should somehow give him the choice of spending may hours reviewing logs or getting rid of both cases.. as they survived the motion to dismiss, i think we stress that they have no damages.. and this a waste of the courts time, he has never ruled on the damage issue , and if it can made cleast that if he rules that there on no damages. we all go home

On Wed, Aug 1, 2012 at 12:13 PM, Tonja Haddad Coleman <[REDACTED]> wrote:  
Hello-

Now I do not work off a script in court, but these are the "talking points" I have prepared for the Hearing on Friday. It is specially-set for one hour, and the Court Order requires us to bring a list of all outstanding discovery, any motions directed to it, any objections or privilege logs applicable to it, and any Orders entered by the Court regarding same. You can see the documents I have prepared through my outline that is attached- and I will use the privilege log and the request delineated in my Motion to Compel and for Sanctions as the outstanding requests. I am not sure if I will need to make the "litigation privilege" argument, but would rather have it than not.

Please let me know your thoughts. I will have the documents and the case law printed out for the court as well.

**Tonja Haddad Coleman, Esq.**

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